DOCUMENT RESUME

ED 451 999 RC 022 936

AUTHOR	Beller, Floyd
TITLE	Title IX Indian Education Toolkit. A Step-by-Step Guide to the Title IX Indian Education Formula Grant.
INSTITUTION	WestEd, San Francisco, CA.
SPONS AGENCY	Office of Educational Research and Improvement (ED), Washington, DC.
PUB DATE	2001-00-00
NOTE	35p.
CONTRACT	RJ96006901
AVAILABLE FROM	WestEd, 730 Harrison Street, San Francisco, CA 94107-1242. Tel: 877-493-7833 (Toll Free).
PUB TYPE	Guides - Non-Classroom (055)
EDRS PRICE	MF01/PC02 Plus Postage.
DESCRIPTORS	*American Indian Education; Elementary Secondary Education; *Federal Aid; Federal Legislation; *Grants; *Grantsmanship; Parent Participation; Technical Assistance
IDENTIFIERS	American Indian Students; *Title IX Education Amendments 1972

ABSTRACT

Title IX is a federal Indian Education Formula Grant Program approved in 1972 and reauthorized five times, most recently in 1994. Title IX formula grants assist groups in providing sound educational programs and opportunities for American Indian and Alaska Native students. A 1997-98 survey of Title IX grantees revealed their need for help in completing Title IX grant applications. This guide responds to that need. The guide is designed to follow along with sections of the "FY 2000 Application for Grants, Formula Grants to Local Educational Agencies, Indian Education Programs." A total of 58 tips outline preliminary steps, steps related to specific sections of the application, ways to collect and develop information needed for various sections of the application, explanations of terminology, cautions, and final steps. A form for Title IX Student Eligibility Certification is included. (SV)

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Indian Education Toolkit

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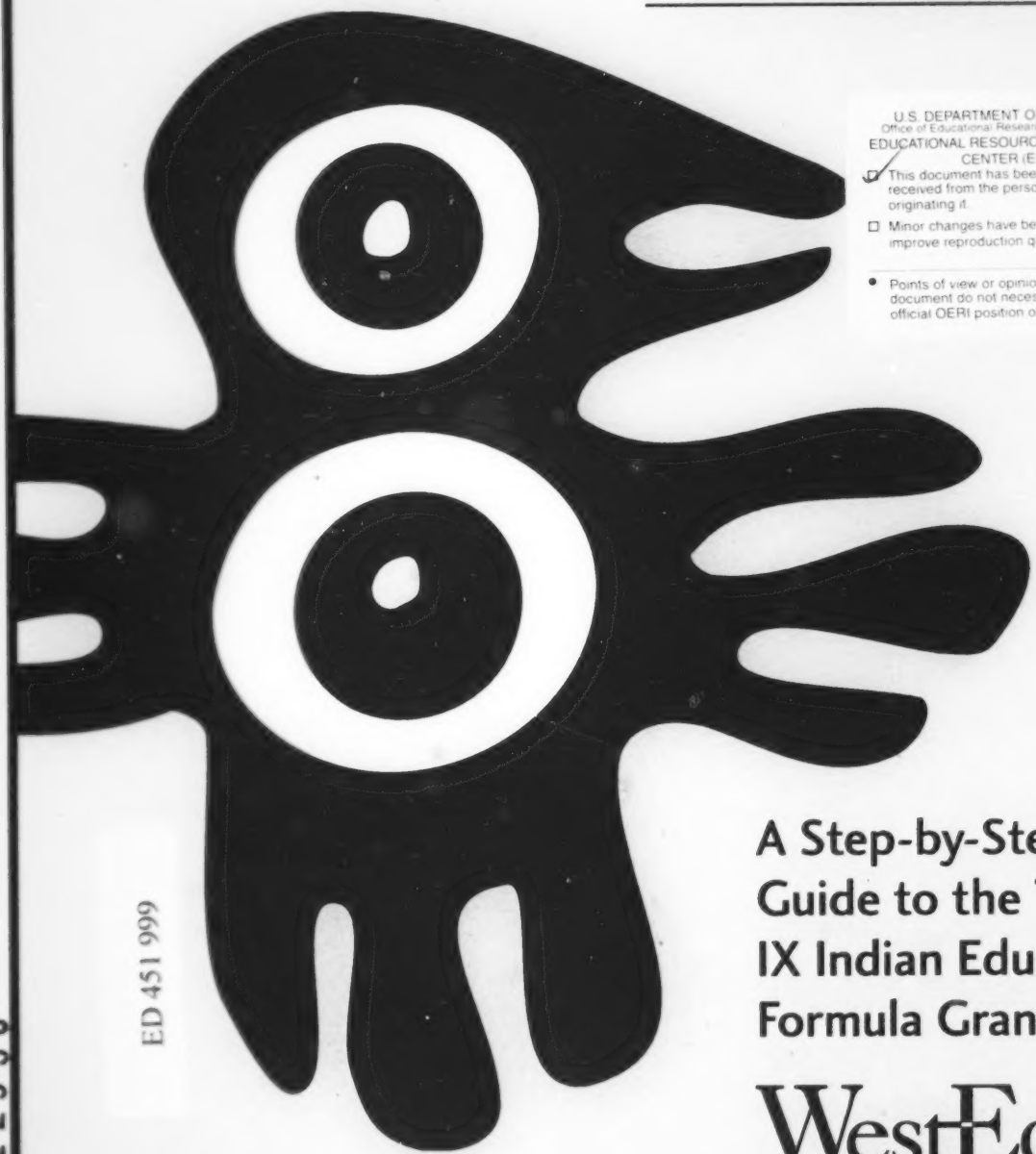

A Step-by-Step Guide to the Title IX Indian Education Formula Grant

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Title IX Indian Education Toolkit

Floyd Beller

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The *Title IX Indian Education Toolkit* was produced in whole or in part with funds from the Office of Educational Research and Improvement, U.S. Department of Education, under contract #RJ96006901. Its contents do not necessarily reflect the views or policies of the Department of Education.

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ACKNOWLEDGMENTS

The *Title IX Indian Education Toolkit* would have been an impossible task to complete without the assistance of many talented colleagues and cohorts. Shirley Hendricks, former Director of the Southwest Indian Education Technical Assistance Center IV in Tempe, Arizona, sparked my interest in generating a special document, or toolkit, that would offer new applicants and continuing grantees additional information to help them complete the Title IX formula grant application.

Dr. Rose Owens-West, a Senior Research Associate with WestEd's Northern California Comprehensive Center, offered ongoing assistance and advice. Dr. Sharon Nelson-Barber, Program Director of WestEd's Language and Cultural Diversity Program and the Indigenous Education Collaborative, gave me needed support and encouragement. Personnel in the U.S. Office of Indian Education, such as Dr. David Beaulieu, Director; Dr. Mary Brayboy, Group Leader; and Cathie Martin, Special Assistant to the Director of Indian Education, have answered all of my questions and provided valuable ideas and information. In addition, I would like to thank all of those who gave their input and suggestions, many included in this document. Specifically, I wish to thank Shirley Hendricks, former Director of the Southwest Indian Education Technical Assistance Center IV, Tempe, Arizona; Deanna Espina, Coordinator of Title IX Indian Education, San Lorenzo (California) Unified School District; James Graham, Coordinator of Title IX, Indian Education, Marysville (California) Unified School District; and Dr. Jerry Barshay, Coordinator of Ventura County Indian Education Consortium, Ventura (California) Unified School District. Thanks also to the following WestEd staff: Senior Communicator Colleen Montoya, who provided substantive and editorial feedback; Communications Assistant Nimfa Rueda, who offered additional editorial support; Administrative Assistant Freddie Baer, who designed the toolkit; and Ed Aust, who designed the cover.

The *Title IX Toolkit* is a joint venture of many constituents. After 26 years in Indian education and many years working with those applying for Indian Education grants, I hope that this toolkit will be a useful resource for all local education agencies and Indian tribes serving American Indian and Alaska Native students.

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INTRODUCTION

> "The Federal Government has a special responsibility to ensure that educational programs for all American Indian and Alaska Native children and adults... are based on high-quality, internationally competitive content standards and student performance standards and build on Indian culture and the Indian community...." — federal statute for Title IX — Indian, Native Hawaiian, and Alaska Native Education, Part A — Indian Education, Sec. 9101. Findings, 20 USC 7801 (*FY 2000 Application for Grants, Formula Grants to Local Educational Agencies, Indian Education Programs*, p. B-9)

Each year, the U.S. government offers local education agencies and Indian and Alaska Native tribes an opportunity to apply for a Title IX Indian Education Act Formula Grant. These formula grants assist groups in providing sound educational programs and opportunities for American Indian and Alaska Native students.

During the 1997-98 academic year, WestEd's Indigenous Education Collaborative surveyed more than 150 Title IX Indian Education Act grantees in Arizona and California. One of the most significant items the grantees indicated was the need for a document that would help them complete a Title IX formula grant application. This *Title IX Education Toolkit* responds to that need.

The toolkit follows the *FY 2000 Application for Grants, Formula Grants to Local Educational Agencies, Indian Education Programs.* It is based on objectives outlined by the U.S. Department of Education's Office of Indian Education (OIE).

Because this particular formula grant application has been in use only since April 1, 2000, both new applicants and continuing grantees will benefit from the tool tips presented in the following pages.

The toolkit begins with a description of Title IX Indian Education Act, Part A, followed by tool tips to help you complete the formula grant application.

WHAT IS TITLE IX INDIAN EDUCATION, PART A?

Title IX is an Indian Education Formula Grant Program approved in 1972 under President Richard Nixon as the Indian Education Act Title IV (Public Law 92-318). The act has been reauthorized five times since 1972, most recently in 1994, as the Improving America's School Act (IASA) or Public Law 108-384. The Part A Formula Grant is one of several IASA programs strengthened by the Elementary and Secondary Education Act reauthorized in 1999 as the Educational Excellence for All Children Act, which promotes high standards in every classroom. Taken together, these acts underscore the special responsibility of the federal government and local education agencies (LEAs) to provide sound educational programs for American Indian[1] and Alaska Native students. School districts or LEAs are called upon to develop programs based on high-quality, internationally competitive content and student performance standards. However, LEAs must also build on indigenous culture drawing from the communities and tribes to meet the needs of these students.

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[1] The *Title IX Indian Education Toolkit* uses the terms, "Indian" and "American Indian," interchangeably.

TOOL TIPS FOR COMPLETING THE TITLE IX PART A FORMULA GRANT APPLICATION

The *Title IX Indian Education Toolkit* is designed to follow along with the *FY 2000 Application for Grants, Formula Grants to Local Educational Agencies, Indian Education Programs.* The tips included in the toolkit are suggestions to help you complete the formula grant application. It is not mandatory that you use this toolkit when completing your application. However, we hope that these tool tips strengthen your understanding and help you to complete an application that describes an Indian Education Program that will serve the academic, behavioral, and cultural needs of your students.

Throughout the toolkit, we reference page numbers from the FY 2000 formula grant application, making it easier for you to follow along with the application.

We recommend that you read the entire Title IX grant application as well as the *Supplemental Guide for Application Completion* prior to reviewing the tool tips. The *Supplemental Guide* is an attachment that comes with the grant application. It is well-organized and gives instructions for completing each of the application forms. Reading the grant application, *Supplemental Guide,* and this toolkit will help ensure that you submit a successful grant application for Title IX funding.

Tool tips for completing the grant application follow.

TOOL TIP #1

Photocopy the grant application or download the application from the Internet.

Before you do anything else, we recommend that you photocopy or download the grant application from the Internet. It is helpful to have extra copies of the application to read through, make notes, to highlight important areas, and to share with others who will be assisting in the application process.

You can view and download the application in text or Adobe Portable Document Format (PDF) at either of the following Web sites:

http://ocfo.ed.gov/fedreg.htm; or

http://www.ed.gov/news.html.

If you are a new applicant, photocopy or download pages C-3 to D-7 from the application. These pages include pertinent information and the application forms.

If you are a continuing grantee, please review the Application Completion Checklist on page D-8. Photocopy or download necessary forms based on this checklist.

Section A: "Dear Applicant Letter" (pp. A-3 – A-4)

TOOL TIP #2

Read carefully the "Dear Applicant" letter.

This letter offers an overview of what is important, including the application submission, instructions for completing the application, and mailing instructions.

TOOL TIP #3

Mail the application to the attention of CFDA #84.060, *not* to your Title IX Program Specialist.

Use certified mail so that you have documentation of the date on which the application was mailed and the signature of the person who received the application at the application control center in Washington, D.C. Keep all mail receipts and document copies together in a file for future reference.

Section B, Part I: Notice Inviting Applications for Awards for Fiscal Year (FY) 2001 and Beyond (pp. B1 – B5)

Section B, Part I includes the notice inviting applications for awards for FY 2000 and beyond. It offers a detailed explanation of what is required of applicants and provides deadline information.

TOOL TIP #4

Review the information included in the notice inviting applications for awards. It includes information pertinent to the award such as who is eligible to receive the award.

Specifically, this section includes the following information:

- purpose of program;
- eligible applicants;
- deadline for transmittal of applications;
- deadline for intergovernmental review;
- applications available;
- available funds;
- estimated range of awards;
- estimated average size of awards;
- estimated number of awards;
- project period;
- applicable regulations; and
- contact information.

Section B, Part II: Federal Statute for Title IX — Indian, Native Hawaiian, and Alaska Native Education (Part A — Indian Education) (pp. B-7 – B-20)

This section will help you understand what Title IX monies can be used for and the various components of the Title IX program.

TOOL TIP #5

Review the sections of the federal statute for Title IX that pertain to your proposed program.

For example, you may need guidance on how to set up your parent committee and/or how to organize the public hearing (both required components of Title IX programs), or specific objectives on how the federal monies can be used (e.g., academic, behavioral, cultural needs).

Section C, Part I: Application for Federal Education Assistance (pp. C-1 – C-5)

Section C, Part I includes the "Application for Federal Education Assistance" page, also commonly known as the "face page."

TOOL TIP #6

Read the instructions first (pp. C-4 – C-5).

Many applicants begin completing the Application for Federal Education Assistance without reading the instructions first (pp. C-4 – C-5). Reading the instructions prior to completing this form will help to ensure that information entered in this form is complete and correct.

Section C, Part II: Budget Information, Non-Construction Programs (ED Form 524) (pp. C-7 – C-12)

The budget ED Form 524 is designed for one-year or multi-year programs. Most applicants apply for a three- or five-year program.

TOOL TIP #7

Read the ED Form 524 instructions first (pp. C-11 – C-12).

The instructions will tell you, line by line, how to complete Ed Form 524.

TOOL TIP #8

Request the per-pupil expenditure for the state in which your LEA or Indian tribe is located.

The per-pupil expenditure information is necessary to complete your total program budget. This information is available from several sources: your

regional Comprehensive Assistance Center, your OIE Education Program Specialist, or your state education agency. After receiving the per-pupil expenditure information, multiply the number of students by the number of Indian students for whom you have 506 forms (see p. E-33) to obtain the proposed budget amount for the school year.

TOOL TIP #9

Make sure you include the correct budget amount for the total grant award.

The following example illustrates how you can determine the correct budget amount:

> The current Indian student expenditure for the state of California is $137.34 per student. Let's say the total number of students identified during your 30-day count period is 100. To calculate your proposed total budget for the academic year (budget line 12), multiply 100 x $137.34 = $13,734.
>
> For multi-year projects, calculate the first year amount, then estimate percentage raises for categories such as personnel and fringe benefits for each of the remaining years of the grant. If you are applying for multi-year funding, you must complete budget categories for the years applied in Section A – Budget Summary (p. C-9).

Keep in mind that the budget categories will differ for each Title IX applicant. For example, some Title IX applicants may not need to budget for equipment. Please remember, though, that all categories for which you budget must total the grant award (line 12, Total Costs).

Section C, Part III: Assurances — Non-Construction Programs (pp. C-13 – C-25)

This section includes federal regulation assurances (e.g., employment, environmental standards) with which your LEA or Indian tribe must comply.

TOOL TIP #10

Your superintendent or another authorized person must sign each of the assurances forms.

Signing these forms ensures the federal government that your LEA or tribe will comply with the requirements, will use Title IX funds specifically for Title IX, and will not use the funds to supplant other programs.

TOOL TIP #11

Keep together all assurances forms.

Keep together all forms needing authorized signatures. Tab each item so that the authorized person can easily locate the item to be signed and/or dated and so that all signatures can be obtained simultaneously.

Section C, Part IV: Comprehensive Plan Summary (pp. C-27 – C-55)

The Comprehensive Plan Summary is divided into several areas (e.g., academic student needs, behavioral student needs, cultural student needs). The federal government requires this information so it could substantiate to the U.S. Congress the various academic, behavioral, and cultural needs of Indian students in the nation and thus continue the Title IX program. Gathering such information also helps you, as an applicant, to better tailor your program by identifying your students' needs (e.g., low-performing schools may need more after-school tutoring).

TOOL TIP #12

If you are a new applicant, you must complete the Comprehensive Plan Summary forms.

If you are a continuing grantee, do not complete Section C, Part IV. Refer to the Application Completion Checklist on page D-8.

Comprehensive Plan Summary: Academic Student Needs (pp. C-29 – C-33)

The comprehensive academic student needs assessment is designed to help you gather data on all identified American Indian and Alaska Native students.

TOOL TIP #13

Collect data for identifying American Indian/Alaska Native students.

Several processes are used to identify Indian students in a school district. Most schools develop their own systems. Many smaller school districts depend on the county schools office to maintain their individual student records. If you are a new applicant, please note that there are several processes for disaggregating data for students listed as American Indian or Alaska Natives. Each state will have its own data collection methods. For example, the state of California's strategies for identifying students who qualify for Title IX services according to ethnicity follow:

- California Basic Education Data System (CBEDS);
- ethnicity cards used by school district upon enrollment;

- copies of birth certificates; and
- Title IX Student Eligibility Certification, 506 Form.

Student performance data you should consider include:

- standardized test scores;
- students' grades;
- criterion reference test scores;
- norm reference test scores;
- state and local achievement test scores;
- school data summaries (Title I or other federally funded programs);
- student diaries;
- SAT scores; and/or
- ACT scores.

Title IX is a formula grant program. The final student count is used to generate funds based on a per-pupil expenditure and to calculate an award for the program. When completing the Indian Student Count-LEA Total Form (p. C-85) of your application, it is necessary to have accurate numbers because they determine the final grant award and they are also subject to an audit by OIE.

Some Indian students may not always have hard evidence of their ancestry. For example, some questions commonly asked by parents follow:

> "I am 1/16 Cherokee Indian and also an enrolled member of the Cherokee Nation of Oklahoma. Would my children qualify for Title IX services?"
>
> "I am not an enrolled member of my tribe, but my father is an enrolled member. Can my children enroll in this program?"
>
> "My mother and father both told me that I am an Indian from Arizona. I have no proof or documentation from any tribe to prove that I am American Indian. Can my children enroll in the Title IX program?"
>
> "My stepfather is an enrolled member of the Delaware Tribe of Oklahoma. Can I enroll my children in the Title IX program?"

The first two examples above qualify students for Title IX per the Title IX Student Eligibility Certification, ED Form 506.

Assuming that one is American Indian or Alaska Native based on what parents or grandparents have told them does not qualify them for Title IX services. At least one parent or grandparent must have some proof or documentation proven by a Certificate of Degree of Indian Blood Card or Enrolled Membership Card for his or her respective Indian tribe (see the federal statute for Title IX, pp. B-15 – B-16).

TOOL TIP #14

Pay close attention to the identified student performance levels — Advanced (A), Proficient (P), and Partially Proficient (N) — noted in the Academic Student Needs form as well as the *Supplemental Guide for Application Completion*.

These performance levels indicate the different degrees to which students are mastering the content standards prescribed by the state's department of education. It is important to review all of the instructions on pages 16–21 of your *Supplemental Guide for Application Completion*.

TOOL TIP #15

Contact your Title I Director, Special Projects Director, or the person in charge of all funded programs in your school district to request the rules and regulations for Title I reporting.

Title I has all the necessary information and data on all Indian students enrolled in your school district's Title I program.

When reviewing the rules and regulations, pay close attention to the following:

- the number of American Indian/Alaska Native students identified in your Title I program;
- the grades tested each year in your school district;
- at a minimum, three areas to include in gathering your test data;
- what it means to *involve multiple measures;* and
- what it means to *disaggregate academic data.*

All of this information is based on requirements used in Title I programs.

TOOL TIP #16

The Title IX Indian Education Program requires data collection.

The following information should be collected, as well as any other pertinent data that describes Indian student groups:

- student attendance during the school year;

- dropout rates for students enrolled in the Title IX program;
- graduation rates for Indian students; and
- standardized test scores, which can be disaggregated by gender, grade level, etc.

The data you provide in your application is disaggregated according to the Indian Education Performance Indicators from which OIE goals are driven. All OIE objectives are driven by targets and performance data, assessment of progress and sources, and data quality.

Comprehensive Plan Summary: Behavioral Student Needs (pp. C-35 – C-37)

Many factors, such as poverty, unemployment, and health problems, hamper the educational performance of Indian students. School dropout rates of Indian students are the highest of any student group nationwide.

Regular absence from class means missing curricular material, classroom assignments, homework, and preparation for both in-class and standardized tests. Self-esteem is often affected, and anger and illness often come into play. Smoking and alcohol and other drugs often begin at an early age, leading to violent behavior, gang participation, use of weapons, and vandalism. Research also shows that Indian students have the highest suicidal rate in the country. Informal studies suggest that the new U.S. Census data will confirm that these patterns have continued over the past 10 years, with few school dropouts continuing their education at nearby adult or vocational programs.

Educators must make schooling effective for American Indian students. Parents must also play an active role in their children's education. They can participate at the classroom and school levels and in parent involvement activities.

Data collected on behavioral needs (e.g., dropout rates, absenteeism, alcohol and other drug use, violence behavior) will help you determine which factors will be used to determine the measurable objectives for your students. For example, if there is a high absentee rate in your school, there is potential for a high dropout rate, suggesting the improvement of attendance would be a good measurable objective.

TOOL TIP #17

Contact the appropriate personnel for behavioral data collection.

For student attendance and dropout information, you might contact the records clerk in your school district or the Drug-Free Schools Program. The child welfare and attendance officer is also an important person to contact regarding student behavior. This person would know if students enrolled in your program have ever

been arrested, brought weapons to school, exhibited violent behavior, and/or vandalized property. The Comprehensive Health and Prevention Program Survey (CHAPPS) can be another data source.

Comprehensive Plan Summary: Cultural Student Needs (p. C-39)

Determining Indian student cultural needs can be a challenge. Students from several hundred American Indian tribes and Alaska Native associations and villages are served by Title IX. These groups do not share traditions, language, or cultures. Different regional needs also exist. Students who live on reservations or have been raised in a traditional culture may have different academic and social needs than students who live in urban areas.

The Indian Education Act focuses on the special responsibility of the federal government and LEAs and tribes to provide sound educational programs for American Indian and Alaska Native students. Programs must be high quality, have internationally competitive content standards and student performance standards, and build on Indian culture to meet the special educational and culturally related academic needs of American Indian and Alaska Native students.

TOOL TIP #18

Collect cultural data from parents and school programs.

The best way for collecting cultural data on Indian students is to develop surveys or questionnaires to administer to parents and/or legal guardians. Convene an advisory group to develop the survey. Advisory group members could include parents of Indian students and members of the Indian education parent committee. It is always a good rule of thumb to involve Indian people who are knowledgeable about the culturally related academic needs of Indian students who live in their communities, including representatives from Indian tribes and Indian organizations. Title VII programs for English language learners and bilingual education programs also are good sources for cultural data.

TOOL TIP #19

Consult with teachers and/or evaluators in your LEA or Indian tribe.

Consulting the "experts" in survey development/administration will help ensure that you develop a cultural survey that is tailored to your audience.

Comprehensive Plan Summary: Indian Student Needs Addressed by LEA Programs (p. C-41)

The information you provide on this form will give OIE an overview of all the programs in your school district that serve American Indian and Alaska Native students (e.g., Title I, bilingual education, advanced placement classes).

TOOL TIP #20

Maintain a running count of the number of students in each of the programs in your school district or ask the teachers or directors of each of the programs to identify which student needs are actually being addressed.

Comprehensive Plan Summary: Project Performance Objectives (pp. C-43 – C-51)

In this section, you will write Title IX measurable objectives according to your LEA or Indian tribe. Your proposed Title IX program may not necessarily cover all of the content/topic areas listed in the Project Performance Objectives form. Page C-43 of the Project Performance Objectives form includes examples that illustrate what is required for form completion. You must base your objectives on challenging state content and student performance standards.

TOOL TIP #21

You must complete objectives for each of the years (five total) for which you are writing the grant.

In addition to your objectives, you must show the gains you expect students to achieve each year. If the need for mathematics assistance is great, for example, it is better to have a few measurable objectives rather than have many objectives that are not met during the school year. It is not a good idea to use the same program objective from year to year over the five years for which you are writing the grant. Your needs assessment will likely identify several academic, behavioral, or cultural needs that can be written into the plan.

Comprehensive Plan Summary: Professional Development (p. C-53)

Professional development is needed in all Indian Education Programs throughout the United States. Often, individuals who fill teaching and tutoring positions in Indian education are well-prepared for teaching, but may have little experience with Indian communities or the sociocultural nuances of life in indigenous communities.

Many school districts are fortunate to have Native teachers and paraprofessionals who understand the cultural, linguistic, and academic needs of these children. However, some school districts have difficulty finding Native

teachers or other teachers with the requisite knowledge and experience to teach across cultures and understandings.

The Comprehensive Assistance Centers working with Title IX and other Indian Education Programs are good resources for addressing professional development needs.

TOOL TIP #22

Understand the meaning of professional development.

Professional development workshops or conferences offer your staff the opportunity to learn new strategies, techniques, and procedures so that they can properly carry out the objectives of the program. Choose only those workshops that directly address the objectives of your program; however, consider taking advantage of as many as your funds will allow. It is also important to ensure that conferences that do relate to your program also provide training sessions for staff beyond the conferences.

Coordinators/directors should consider making professional development opportunities available on site. The majority of these sessions should happen at the beginning of the school year. [*Note:* The federal statute of Title IX — Indian, Native Hawaiian, and Alaska Native Education (20 USC7814, Sec. 9114. Applications.; p. B-12-13 B) states that all teachers who will be involved in programs assisted under this subpart have been properly trained to carry out such programs as described.]

Comprehensive Plan Summary: Indian Student Assessments (p. C-55)

In the Indian Student Assessments form, you must identify how your LEA or tribe will periodically assess the progress of *all* Indian children enrolled in your schools (including Indian children who do not participate in the activities funded by Title IX).

Many applicants have questioned why Indian students who are not enrolled in the Title IX Indian Education Program have to be included in the assessment procedures. It is required by federal law that all Indian children enrolled in the schools of the LEA or tribe be counted in periodic assessment totals for each year during the grant period.

TOOL TIP #23

Ask your Title IX Project Director to review the most recent test scores of the Indian students enrolled in your LEA and provide information about these scores to the parent committee and the Indian community during the public hearing.

Reviewing student test scores will help determine the academic progress of your students. Test score data also provide information about how the Indian students who are not enrolled in the Title IX program are doing academically. And you could compare whether the Indian students who are not enrolled in the program are affecting the total scores for the Title IX students. Providing student test score information to parents during the public hearing will give them the opportunity to enroll their children in the Title IX program for the following school year, particularly if their children need academic services.

TOOL TIP #24

Pay particular attention to the multi-year period justification explanations.

There are specific requirements for those applying for a multi-year project grant. For example, there are two types of multi-year funding: three-year and five-year funding. Many procedures can be used on a year-to-year basis. Your parent committee and the Indian community can be of great help in determining which needs are to be addressed to complete your application.

Section C, Part V: Comprehensive Plan Summary: Project Performance Objectives, Substantial Progress Summary, and Indian Student Assessments (Required for Continuation Applications) (pp. C-57 – C-75)

If any of your Title IX original objectives that were approved by OIE are changed in any way whatsoever, you, as a continuing grantee, must send new completed program objectives to your OIE Program Specialist for final approval.

TOOL TIP #25

If you decide to change any program objective in any of the three or five years of your continuation grant, you must complete a new Project Performance Objectives form, Substantial Progress Summary form, and Indian Student Assessments form.

TOOL TIP #26

If your LEA or Indian tribe receives a three- or a five-year grant, you must complete the necessary requirements each year that is addressed in the continuation application section, or you will not be funded the next school year and thus will lose your multi-year grant award status.

Many applicants who were not awarded a three- or a five-year grant either forgot to send in the application or did not read the *Supplemental Guide for Application Completion* well enough to discover that they must write objectives for *each* year for which they are requesting Title IX funding.

Section C, Part VI: Budget Detail Summary (pp. C-77 – C-81)

The Budget Detail Summary is divided into two sections: personnel funded by your project and budget categories funded by your project. This budget form is a more detailed, narrative budget than ED Form No. 524 (pp. C-9 – C-10). For example, in the Budget Detail Summary, you must describe the equipment you will use for the program and the type of teachers (by type or title) you will enlist for the program. You also must list the objective to which each budget item relates.

TOOL TIP #27

After completing and reviewing your budget, ask yourself the following questions:

- **Are all costs allowable according to the rules and regulations of this project?**
- **Are all costs related to the objectives of this project?**
- **Are all costs reasonable and cost effective in terms of providing the best services possible for this project?**

Section C, Part VII: Indian Student Count – LEA Total (pp. C-83 – C-85)

As indicated in the instructions to the Indian Student Count — LEA Total: "This form is used to establish the total Indian student count of the LEA for the purpose of generating funds under the Indian education formula grant program. The information from the individual ED 506 forms on file during the count period for Indian students enrolled in the LEA during the designated count period is to be compiled and reported on this form." (p. C-85)

TOOL TIP #28

Because the Indian student count is a very important requirement of the Title IX program, please refer to the federal statute for Title IX, Sec. 9116 (pp. B-15-B16) for more information before completing the Indian Student Count — LEA Total.

The information you glean from the federal statute for Title IX will give you a better understanding of the eligibility and student enrollment requirements. Such student enrollment will be derived from the Title IX Student Eligibility Certification (ED Form 506, p. E-33) that you must complete as part of your application.

TOOL TIP #29

Schools that are funded and/or operated by the U.S. Bureau of Indian Affairs are not required to collect and keep ED 506 forms on file for their students.

Student counts for schools funded and/or operated by the U.S. Bureau of Indian Affairs are generated through the Indian School Equalization Program (ISEP) that OIE obtains from the U.S. Bureau of Indian Affairs Office. [*Note:* Applicants, including tribes that do not have an LEA or a parent committee, must collect and maintain ED 506 forms on each student counted to generate Title IX funds.]

Section C, Part VIII: Parent Committee Approval (pp. C-87 – C-91)

The federal statute for Title IX — Native Hawaiian, and Alaska Native Education (20 USC 7814, Sec. 9114) (p. B-14) describes the purpose of the parent committee and its role in helping to develop, monitor, and evaluate program activities for each LEA or tribe.

It is required by law, that any LEA or Indian tribe requesting federal funds to direct a Title IX Indian Education Program must have an Indian education parent committee that will serve the Title IX American Indian and Alaska Native students who are enrolled in the school district, tribal school district, or consortiums.

TOOL TIP #30

One of your first roles as a new applicant is to establish criteria and publicize procedures for selecting members of an Indian education parent committee.

You should announce the Indian education parent committee to be formed by notifying all identified Indian parents of American Indian/Alaska Native students by: U.S. mail, newspaper article or press release, or radio or television public service announcements.

TOOL TIP #31

Refer to the federal statute for Title IX — Indian, Native Hawaiian, and Alaska Native Education (20 USC 7814, Sec. 9114) (p. B-14), which describes how an LEA forms its parent committee.

TOOL TIP #32

Parents who attend the first Title IX Indian education parent planning meeting should receive information that describes the purpose of the Title IX program, procedures for selecting the parent committee, and the roles and responsibilities of the parent committee.

If you make it too difficult for parents to understand these roles and responsibilities, many parents will not want to participate. Indian parents who attend the first Title IX Indian education parent planning meeting should have the opportunity to ask questions and decide if they want to take part in the Title IX program.

TOOL TIP #33

Identify eligible members of the parent committee.

You must review the rules and regulations of parent committee membership. Eligible members include parents of Indian children, grandparents or legal guardians raising the child, secondary students (if your LEA is also serving secondary students), and teachers who work in your LEA requesting funds (see the federal statute for Title IX, pp. B-9 – B-20).

TOOL TIP #34

The parent committee can only be selected or voted on by parents of Indian students who are enrolled in your district's proposed Title IX Indian Education Program.

There might be interested people in the Indian community who would like to serve on the committee, but if they do not meet the criteria for parent committee membership, they are not eligible. However, volunteers are welcome to assist with program activities. Volunteers can attend all the parent committee meetings and take part in open discussions, though they would not be voting members. All meetings must be open to the public.

TOOL TIP #35

After the parent committee has been selected, ensure that bylaws are the first order of business.

In designing the bylaws, parent committee members should be very careful in specifying roles of the committee. The bylaws should reflect the size of your LEA. If your LEA is classified as rural, the bylaws would be different from those of a large urban school district or a consortium. School districts located on Indian reservations also would have different requirements.

TOOL TIP #36

You may review sample parent committee bylaws[2] at www.nwrac.org/links/indian.html/

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[2] Roby Clark, Associate, with the Northwest Regional Educational Laboratory, and his colleagues were instrumental in developing these bylaws.

Click on Links, then click on Indian Education. You will see "Indian Education Resources" and then scroll down to the bottom of the page to "Model Title IX Parent Committee By-laws."

TOOL TIP #37

The parent committee is not only required to participate in developing the Indian Education Program, but must also participate in developing policies and procedures regarding the hiring of personnel and for monitoring and reviewing the program over the project year.

TOOL TIP #38

Consider forming a committee of two or three members of the parent committee to monitor and review the Indian Education Program.

The monitoring and review committee will review and observe the Title IX program components and activities in action, or visit one of its programs on a school site. If the program components consist of tutoring, counseling, and cultural history, this committee would visit one of these sessions in operation and present its findings to the full parent committee.

If a program requires modification, this would be the best time to make these recommendations to the parent committee. It is important to have the Title IX Project Director and your LEA's evaluator be in attendance when your parent committee reviews your Title IX program.

TOOL TIP #39

An external evaluator from your LEA should work closely with the parent committee's monitoring and review committee to prepare the final evaluation report for the program.

The final evaluation report must be given to your LEA to substantiate program progress.

Parent Committee Approval Forms

The Parent Committee Approval forms separate a program that is run by an LEA or tribe from one that is consolidated in a Title I schoolwide program. The first form (p. C-89) is designed for LEA parent committees to provide evidence that it was involved in completing the application.

TOOL TIP #40

You must submit a Parent Committee Approval form as part of your application.

TOOL TIP #41

Because there are four lines on the first Parent Committee Approval form (p. C-89) for parent committee signatures, a student member and a teacher member, in addition to parents or legal guardians, are both eligible to sign the document.

According to the federal statute for Title IX, teachers and secondary school students who are elected members of the parent committee are eligible to sign the Parent Committee Approval Form. However, it is in the best interest of the parent committee to have two or more Indian parents sign the document with a secondary student member or a teacher member providing the fourth signature.

TOOL TIP #42

The parent committee must complete the second Parent Committee Approval form (p. C-91).

Please remember that, because the Title IX Indian Education Program is part of a schoolwide program, the parent committee must continue to meet and review the progress of students who are participating in the program. As stated on the form, it is up to the parent committee to determine "that the schoolwide program is consistent with the purpose of the formula grant program, and will not diminish the availability of the culturally related activities for the Indian students." (p. C-91)

Public Hearing

TOOL TIP #43

As a Title IX grantee, LEAs are responsible for organizing the Indian education public hearing.

LEAs must hold a public hearing to give the parent committee, Indian community, and the general public the opportunity to review the Title IX draft grant application and to provide recommendations to your LEA.

When scheduling your public hearing, allow enough time to make changes approved by the parent committee. It may be necessary to extend the public hearing so that the parent committee may review the second draft of the application. However, because the FY 2000 formula grant application requires more data than narrative reporting, one meeting may be sufficient.

TOOL TIP #44

Advertise the public hearing.

LEAs must advertise the public hearing in local newspapers at least 7 to 10 days in advance of the hearing. In addition to newspaper announcements, be sure that letters go out to all Indian organizations, tribal leaders, elementary, middle, and secondary schools for their bulletin boards and school district offices. You can never have too much coverage.

TOOL TIP #45

Parent committee members and the general public should have ample time at the public hearing to review and ask questions about each part of the Title IX application.

The Title IX Project Director or the appropriate school district personnel should be at the public hearing to field parent questions.

TOOL TIP #46

Following the public hearing, the parent committee must approve the final draft of the application before it is sent to the LEA's board of education for approval.

TOOL TIP #47

Parent committee members, parents of Indian students, and the Indian community should attend the board of education meeting.

School board members may have questions about the Title IX program that should be answered by the Project Director or the chairperson of the committee. A strong delegation of Indian people attending the board meeting oftentimes shows the actual strength of the program.

Section C, Part IX: Notice to All Applicants (pp. C-93 – C-96)

TOOL TIP #48

If you are a new applicant, please review the Notice to All Applicants.

This section provides information on a new provision in the Department of Education's General Education Provisions Act that applies to new applicants. As stated in the notice, "All applicants for new awards must include information in their applications to address this new provision in order to receive funding under this program." (p. C-95)

Section D, Part I: Application Transmittal Instructions (pp. D-1 – D-3)

TOOL TIP #49

Read the Application Transmittal Instructions carefully as it includes specific mailing instructions.

If you do not mail your grant application per the instructions provided, you might not receive Title IX funding.

Section D, Part II: Application Completion Checklist (pp. D-5 – D-8)

The Application Completion Checklist will help you to determine whether you have met all requirements of the formula grant application.

TOOL TIP #50

Make sure you have completed all components of the Title IX formula grant application.

Section E, Part I: Executive Order 12372 — Intergovernmental Review (pp. E-1 – E-3)

All applicants, except for Indian tribes, "must contact the appropriate State Single Point of Contact to find out about, and to comply with, the state's process under Executive Order 12372. Applicants proposing to perform activities in more than one State should contact, immediately upon receipt of this notice, the Single Point of Contact for each State and follow the procedures established in those States under the Executive Order." (p. E-3)

The State Single Point of Contact acts as a "clearinghouse." Its role is to ensure that your school district is complying with state and federal regulations.

Section E, Part II: Executive Order 12372 (List of Designated State Single Points of Contact) (pp. E-5 – E11)

This section lists the designated State Single Points of Contact, referenced in Section E, Part I: Executive Order 12372.

TOOL TIP #51

Some states no longer participate in the Intergovernmental Review of Federal Programs. Refer to the List of Designated State Single Points of Contact to find out whether the state in which your LEA is located participates in the process.

Section E, Part III: DUNS Number Instructions (pp. E-13 – E-15)

This section describes in detail the purpose of the D-U-N-S number that you must provide on the application cover page (ED 424 form, item #2, p. C-3). It also indicates where you can obtain the D-U-N-S number for your LEA or tribe.

Section E, Part IV: Indian Education Performance Indicators (pp. E-17 – E-23)

This section includes background information on the Office of Indian Education (OIE). For example, it lists the goal and objectives of OIE, as well as Title IX funding information and key strategies.

Section E, Part V: Office of Indian Education (List of OEI Program Specialists and Group Leaders by State) (pp. E-25 – E-28)

As an applicant, you have an OIE contact person assigned to you. This contact person can help you complete various items of your grant application. For example, you may request the per-pupil expenditure information from your OIE Program Specialist.

TOOL TIP #52

If you need assistance completing the application after reading through the tool tips in this toolkit, please contact your OIE Program Specialist.

Section E, Part VI: Indian Student Eligibility Form (ED 506 Form) (pp. E-29 – E-33)

Your Title IX program's funding and objectives are derived from the information you provide on Student Eligibility forms.

TOOL TIP #53

The first step in developing a Title IX Indian Education Program is to have your LEA identify all students of American Indian and Alaska Native descent enrolled in your school district.

To identify students, your LEA must have the students' parents or legal guardian complete a Title IX Student Eligibility Certification (Ed Form 506), (p. E-33), which you will find in the Appendix of this toolkit. Your LEA is responsible for keeping on file the proper forms that establish the status of each eligible American Indian/Alaska Native student.

A *completed* Title IX Student Eligibility Certification (Ed Form 506) should include the following:

- the name of the tribe or band of Indians in which the student claims membership;
- the enrollment number establishing the membership of the student (if readily available);
- the name and address of the organization that maintains updated and accurate membership data for such tribe or band of Indians;
- if the student is not a member of a tribe or band of Indians, the name, the enrollment number (if readily available), and the organization (and address thereof) responsible for maintaining updated and accurate membership rolls of any parent or grandparent of the student from whom the student claims eligibility; and
- any other information that the U.S. Secretary of Education considers necessary to provide an accurate program profile.

The *minimum* information required for a student to be included in the computation of a grant award under the federal statute for Title IX, Sec. 9115 (pp. B-15 – B-16) follows:

- the name of the student;
- the name of the tribe or band of Indians (as defined in Sec. 9116 of the federal statute, p. B-15) with respect to which the student claims eligibility; and
- the dated signature of the parent or legal guardian of the student.

For more information regarding student eligibility, please refer to the federal statute for Title IX (pp. B-9 – B-20).

TOOL TIP #54

Your LEA must have the Title IX Student Eligibility Certification (506) forms on file before a budget and a program plan can be implemented.

The directions in the large box located at the top of the 506 form give parents specific instructions for completing the form. It also informs the parents that they only have to complete one form, which will be part of the student's record, and they will not have to complete forms on a yearly basis.

The large box includes the definition of who qualifies as "Indian," which parents will match against their information and documentation. The 506 form is a confidential document. Written approval from a parent must be sent to your LEA before any information on this form can be released. (Information could be requested from the school district by the courts or other federal agencies).

TOOL TIP #55

Review procedures for identifying eligible Indian students.

Program coordinators/directors are constantly looking for new ways to identify Indian students. Following are some of the procedures many use to locate eligible students, thereby increasing the Indian student enrollment numbers:

- Write a series of articles to local newspapers announcing the availability of the Title IX Indian Education Program in your LEA and the services it will offer students.
- Survey all parents in the district and provide them with a cover letter delineating the services to be offered to students.
- Place posters in each of the school libraries announcing the Title IX Indian Education Program and how students can take part in it.
- Write an article for your district school's PTA or PTO newsletter.
- Ask the school district superintendent to announce the program in her or his newsletter to the district staff and the ways it will help students of Indian descent improve their academic and cultural development.
- Ask the Director of Specially Funded Programs or the Coordinator of the Indian Education Program to give a special presentation with an open discussion during a meeting of the LEA's principals.
- Give presentations at teachers' meetings, which can heighten awareness and yield additional numbers of identified students.
- Announce the Title IX Indian Education Program at open houses at each school in your district. This will give parents the opportunity to ask questions; they could also complete 506 forms at that time.
- Network with other Title IX grantees, especially those who have been in the program for many years and who have large American Indian/Alaska Native populations in their school districts.

Section E, Part VII: Important Notice to Prospective Participants in USDE Contract and Grant Programs (pp. E-35 – E37)

This section provides information regarding grant application deadlines as well as contact information regarding submission of applications.

Section E, Part VIII: Grant Application Receipt Acknowledgement (E-39 – E-41)

This section includes contact information if you fail to receive notification of grant application receipt within 15 days from the closing date. Web addresses for general grant and contract funding information are also provided.

ADDITIONAL TOOL TIPS

TOOL TIP #56

Have the special projects' external evaluator review your Title IX Indian Education Program.

Findings from an external evaluator could be used in your end-of-the-year performance report that must be submitted to OIE at the end of each project year. The external evaluation report should be used to increase the efficiency of progress made during the school year by the recommendations and findings of the evaluator.

Please keep in mind that the evaluator must be external from your Title IX program. He or she can be an evaluator from within your school district but must be external to your program.

TOOL TIP #57

Be sure you complete your Title IX annual performance report at the end of each project year.

OIE requires that you, as an applicant, keep pertinent records on the number of certified Indian students as well as other Indian students who are enrolled in your LEA or Indian tribe but who are not enrolled in the Title IX Indian Education Program. A total count of all the Indian students must be used in completing this portion of the annual project performance report.

TOOL TIP #58

When completing your project performance report, remember to complete only the areas that pertain to your objectives (e.g., the reading skills of low performing students, grades 3-6).

Additional information about the end-of-the-project final performance report will be available through the OIE Program Specialist responsible for your area.

CONCLUSION

We hope that this toolkit helps you complete your Title IX formula grant application, as well as give you a better understanding of the intent of OIE and its legislation. If you need more information concerning this formula grant program, please contact the:

U.S. Department of Education
Office of Indian Education
400 Maryland Avenue, SW
Washington, DC 20202-6335;
Fax: 202.260.7779;

or telephone:

Dr. Mary Brayboy
Team Leader
202.260.1648.

APPENDIX

TITLE IX STUDENT ELIGIBILITY CERTIFICATION (ED FORM 506)

ED Form 506

OMB No. 1810-0031
Approval Expires: 10/31/2001

U.S. DEPARTMENT OF EDUCATION
OFFICE OF INDIAN EDUCATION
WASHINGTON, DC 20202

TITLE IX STUDENT ELIGIBILITY CERTIFICATION

Elementary and Secondary Education Act, Title IX, Part A, Subpart 1

Parents: **Please return this completed form to your child's school**. In order to apply for a formula grant under the Indian Education Program, your child's school must determine the number of Indian children enrolled. Any child who meets the following definition from the Act may be counted for this purpose. You are not required to complete or submit this form to the school. However, if you choose not to submit a form which contains at least the child's name, the name of the tribe, band or group, and your dated signature, your child cannot be counted by the school for funding under the Act. **This form will become part of your child's school record and will not need to be completed every year**. The information on this form will not be released without your written approval.

Definition: Indian means any individual who is (1) a member (as defined by the Indian tribe or band) of an Indian tribe or band, including those Indian tribes, bands, or groups terminated since 1940, and those recognized by the State in which they reside; or (2) a descendent in the first or second degree (parent or grandparent) as described in (1); or (3) considered by the Secretary of the Interior to be an Indian for any purpose; or (4) an Eskimo or Aleut or other Alaska Native; or (5) a member of an organized Indian group that received a grant under the Indian Education Act of 1988 as it was in effect October 19, 1994.

NAME OF CHILD _____ Date of Birth __/__/__
(As shown on school enrollment records)

School Name _____ Grade _____

NAME OF TRIBE, BAND or GROUP _____

Tribe, Band or Group is: (check one)

____ Federally Recognized, including Alaska Native ___ State Recognized ___ Terminated ___ Organized Indian Group meeting #5 of the definition above

Name of individual with tribal membership:_____

Individual named is (check one): ____ Child ____ Child's parent ____ Child's grandparent

Proof of membership, as defined by tribe, band, or group:

A. Membership or enrollment number _____ OR

B. Other (explain) _____

Name and address of organization maintaining membership data for the tribe, band or group:

_____

I verify that the information provided above is accurate:

PARENT'S SIGNATURE _____ **DATE** _____

Mailing Address _____ Telephone _____

Notice: Public Reporting Burden Notice on Reverse Side.

BEST COPY AVAILABLE